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JAMES W. MCCORMACK
DAVID A. STEBBINS

BY: _____
VS. _____

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF ARKANSAS
LITTLE ROCK DIVISION

CASE NO. 4:16CV00545-JM

STATE OF ARKANSAS, ARKANSAS
REHABILITATION SERVICES, AND AMY JONES

DEFENDANTS

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

AUG 29 2017

JAMES W. MCCORMACK, CLERK
By: _____
PLAINTIFF _____ DEP. CLERK

RESPONSE TO MOTION FOR EXTENSION OF TIME

Comes now, *pro se* Plaintiff David Stebbins, who hereby submits the following response to the Defendant's Motion for Extension of Time.

1. The Defendants request more time to compile the documents for their discovery responses for no other reason than ... they just haven't completed their responses yet.
2. The Defendants have offered no excuse, and have none to offer, for why they have not completed the compilation yet.
3. This infringes on my rights. Discovery must be completed by January 12, 2017, according to the Final Scheduling Order. When I receive the Defendants' discovery responses, I have the right to use those responses to create follow-up discovery responses. Granting this extension cuts into the time I'm allowed to conduct this type of follow-up discovery. Less time to conduct follow-up discovery heavily prejudices me.
4. If they want an extension, they should have to show proof of the following:
 - They actually *need* this much time, instead of merely *wanting* it, and
 - There is a good reason why they haven't completed their discovery responses in the literally half a year they have had to compile these documents.
5. Unless and until they can show proof of those two things, they should not be allowed to deprive me of my right to discovery. I am heavily prejudiced by this extension, and so they

should have to show very good cause why they deserve it more than I deserve a full discovery.

6. I am not inherently opposed to extensions of time to comply with discovery if the Defendants can show cause that they actually need it and it isn't their fault they need it. But if they cannot show these things, then I should not be made to suffer prejudice to my case due to less discovery time, just to compensate for *their* incompetence and/or laziness.

7. Last but not least, the Defendants should, at the very least, be ordered to reply to the discovery requests they do have completed ... just to prove that they really are working as fast as they can to complete these discovery requests and are not just looking for an excuse to delay having to respond to them. Doing this, I could still perform follow-up discovery on half of the discovery responses.

8. Therefore, the Motion for Extension of Time to File Discovery should be denied.

So requested on this, the 26th day of August, 2017.

A handwritten signature in black ink, appearing to read "David Stebbins", with a horizontal line underneath it.

David Stebbins
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